

Magistrate Judge S. Kate Vaughan

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff

v.

CHAD CONTI,

Defendant.

CASE NO. MJ24-626

COMPLAINT for VIOLATION

21 U.S.C. § 841(a)(1) and (b)(1)(C)

BEFORE, S. Kate Vaughan, United States Magistrate Judge, U. S. Courthouse,  
Seattle, Washington.

The undersigned complainant being duly sworn states:

**COUNT ONE**

**Possession with Intent to Distribute Controlled Substances**

On or about October 2, 2024, in King County, within the Western District of  
Washington, CHAD CONTI did knowingly and intentionally possess with intent to  
distribute, a controlled substance, N-phenyl-N- [ 1- ( 2-phenylethyl ) -4-piperidinyl ]  
propanamide (fentanyl), a substance controlled under Title 21, United States Code.

All in violation of Title 21, United States Code, Section 841(a)(1) and  
841(b)(1)(C).

1 And the complainant states that this Complaint is based on the following  
2 information:

3 I, Shawna McCann, being first duly sworn on oath, depose and say:

4 **INTRODUCTION AND AGENT BACKGROUND**

5 1. I am employed as a Special Agent (SA) with the Federal Bureau of  
6 Investigation (FBI) and have been employed with the FBI since September 2017. I am  
7 currently assigned to the Seattle Field Division where I am a member of the violent  
8 crime, gang, and Transnational Organized Crime—Western Hemisphere squad. In this  
9 capacity, I investigate, inter alia, violations of 21 U.S.C. § 801 et seq. (the Controlled  
10 Substances Act), and related offenses. I have received specialized training in the  
11 enforcement and investigation of the Controlled Substances Act. I have received over  
12 400 hours of classroom training including, but not limited to, drug identification, drug  
13 interdiction, money laundering techniques and schemes, smuggling, and the investigation  
14 of individuals and/or organizations involved in the illegal possession, possession for sale,  
15 sales, importation, smuggling, manufacturing, and trafficking of controlled substances.

16 2. In my role as a Special Agent for the FBI, I have participated in narcotics  
17 investigations (e.g., heroin, cocaine, fentanyl, marijuana, and methamphetamine) that  
18 have resulted in the arrest of individuals and the seizure of illicit narcotics and/or  
19 narcotics-related evidence and the forfeiture of narcotics-related assets. I have been  
20 involved in the service of federal and state search warrants as part of these investigations.  
21 I have encountered and have become familiar with various tools, methods, trends,  
22 paraphernalia, and related articles utilized by various traffickers in their efforts to import,  
23 export, conceal, and distribute controlled substances. I am also familiar with the manner  
24 in which drug traffickers use telephones, often cellular telephones, to conduct their  
25 unlawful operations, and how they code their conversations to disguise their unlawful  
26 activities. I am also familiar with the various methods of packaging, delivering,  
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1 transferring, and laundering drug proceeds. Additionally, through my training and  
2 experience, I can identify illegal drugs by sight, odor, and texture.

3 3. I am an investigative law enforcement officer of the United States within  
4 the meaning of 18 U.S.C. § 2510(7). As such, I am empowered to conduct investigations  
5 of, and to make arrests for, violations of the Controlled Substances Act, and related  
6 offenses.

7 4. I have also worked on drug investigations involving the use of court-  
8 authorized wiretaps under Title III. In that capacity, I have had the opportunity to  
9 monitor, listen to, and review transcripts and line sheets (prepared by linguists)  
10 documenting the content of hundreds of intercepted conversations involving the  
11 trafficking of cocaine, methamphetamine, heroin, and other narcotics, by persons who  
12 used some form of code to attempt to thwart law enforcement detection. I have also  
13 interviewed defendants at the time of their arrest and have debriefed, spoken with, and/or  
14 interviewed numerous drug dealers or confidential sources (informants) at proffer and  
15 field interviews who were experienced in speaking in coded conversation over the  
16 telephone. From these interviews, and also from discussions with other experienced  
17 agents, I have gained knowledge regarding the various methods, techniques, codes,  
18 and/or jargon used by drug traffickers in the course of their criminal activities, including  
19 their use of firearms to protect their narcotics-related activities and of cellular telephones  
20 and other electronic means to facilitate communications while avoiding law enforcement  
21 scrutiny.

22 5. I have written affidavits in support of court-authorized federal warrants and  
23 orders in the Western District of Washington for GPS tracking of telephones, Pen  
24 Register/Trap and Trace, and search warrants. Additionally, I have testified in grand jury  
25 proceedings, written investigative reports, and conducted and participated in numerous  
26 interviews of drug traffickers of various roles within drug organizations, which has  
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1 provided me with a greater understanding of the methods by which drug trafficking  
2 organizations operate.

3 6. I am an investigative law enforcement officer of the United States within  
4 the meaning of 18 U.S.C. § 2510(7). As such, I am empowered to conduct investigations  
5 of, and to make arrests for, violations of the Controlled Substances Act, Title 21, United  
6 States Code, Section 801 *et seq.*, and related offenses.

### 7 SOURCES OF INFORMATION

8 7. I have obtained the facts set forth in this Complaint through my personal  
9 participation in the investigation described below; from my review of intercepted calls to  
10 date; from oral and written reports of other law enforcement officers; from records,  
11 documents, and other evidence obtained during this investigation; and from confidential  
12 sources who are associated with and knowledgeable about the subjects of this  
13 investigation. I have obtained and read official reports prepared by various law  
14 enforcement officers participating in this and other investigations. I have not included  
15 every fact known concerning this investigation. I have set forth the facts that I believe are  
16 necessary for a fair determination of probable cause. During this investigation,  
17 investigators have made use of numerous investigative techniques, including but not  
18 limited to making controlled purchases of controlled substances; executing search  
19 warrants; seizing drugs and drug proceeds; conducting video and physical surveillance;  
20 and conducting a financial investigation.

### 21 SUMMARY OF THE INVESTIGATION

22 8. The United States, including the FBI and the Seattle Police Department, is  
23 conducting a criminal investigation of a regional DTO that is supplied primarily by out-  
24 of-state sources regarding possible violations of the Target Offenses. Investigators are  
25 referring to this regional DTO, to include its out-of-state suppliers, as “the Jackson DTO”  
26 and have identified Marquis Jackson and Markell Jackson as prominent members of the  
27 DTO.

1           9. The investigation into the Jackson DTO began in early 2022 and has  
2 identified that the Jackson DTO is affiliated with a local street gang known as “44  
3 Holly,” which is a subset of the Crips gang. Law enforcement identified public social  
4 media posts of Marquis Jackson that depict images of large quantities of unexplained  
5 cash and other indicators of narcotics trafficking activity. Further, according to an  
6 October 2022 Phoenix Police report, law enforcement arrested Jackson for possessing a  
7 stolen vehicle. In his possession, he had three iPhones, \$10,100 in cash, a gold and  
8 diamond Rolex watch, and a gold and diamond necklace. Law enforcement also found a  
9 stolen firearm in the rear seat. Based on my training and experience, I know that such  
10 large amounts of cash and valuables along with possessing multiple cell phones is  
11 consistent with narcotics trafficking and possessing multiple phones is a common tactic  
12 by narcotics traffickers to avoid detection from law enforcement.

13           10. In mid-October 2023, a confidential informant (CS3) advised investigators  
14 that Markell Jackson, who CS3<sup>1</sup> only knew by the moniker “Chapo,” contacted CS3 via  
15 phone number (425) 953-9277 (TT11) and offered to sell CS3 fentanyl pills.

16           11. From late October 2023 to March 2024, investigators conducted controlled  
17 purchases of fentanyl-laced pills ranging from 2,000 pills to 5,000 pills from Markell  
18 Jackson and his runners, Adean Batinga and Robert Johnson, first using CS3 and then an  
19 undercover agent posing as a drug customer from Canada whom CS3 was able to  
20 introduce to Markell Jackson. These controlled purchases of narcotics further confirmed  
21 CS3’s reporting that Markell Jackson is working as part of the Marquis Jackson DTO to  
22 traffic fentanyl pills and established a trend of the DTO using multiple cell phones at a  
23 time.

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25 <sup>1</sup> CS3 is a paid confidential source with DEA and the Whatcom Gang and Drug Task Force. CS3 has provided  
26 credible and reliable information, which has been corroborated, both during other investigations and during this  
27 investigation. CS3 has felony convictions for burglary and theft, which were over twenty years ago. CS3 has a  
recent deferred misdemeanor theft conviction, which was deferred in 2019. CS3 has other misdemeanor convictions,  
the most recent of which was over fifteen years ago. CS3’s identity is not being disclosed in this application to  
protect CS3’s safety.

12. Since early 2022, the United States, including the FBI and the Seattle Police Department, have been conducting a criminal investigation of a regional drug trafficking organization (DTO) that is actively distributing controlled substances, being fentanyl and fentanyl analogues. Investigators are referring to this regional DTO, to include its out-of-state suppliers, as “the Jackson DTO” and have identified Marquis Jackson and Markell Jackson as prominent members of the DTO.

13. On September 25, 2024, a Grand Jury returned an indictment charging fourteen members of the Marquis Jackson DTO with drug trafficking and money laundering related charges, including: Marquis Jackson, Markell Jackson, Mandel Jackson, Matelita Jackson, Miracle Jackson, Keondre Jackson, Diyana Abraha, Adean Batinga, Robert Johnson, Terrique Milam, Edgar Valdez, Michael Young, Tyrell Lewis, and Tianna Karastan. The Indictment charged (1) conspiracy to distribute controlled substances, specifically fentanyl, in violation of Title 21, United States Code, Section 846, 841(a)(1); (2) conspiracy to commit money laundering in violation of Title 18, United States Code, Section 1956(h); and three counts of distribution of a controlled substance, fentanyl, in violation of Title 21, United States Code, Section 841(a)(1).

### **SUMMARY OF PROBABLE CAUSE**

14. On September 26, 2024, agents obtained a search warrant to search several subject premises including the residence located at 14011 SE 177th St, Apt P104, Renton, Washington referred to as Subject Premises 4.

15. On October 2, 2024, agents executed a search warrant at Subject Premises 4. Chad Conti was found present in the apartment. This apartment was a two-bedroom apartment. One bedroom appeared to belong to a teenager, who was not present at the time of the search warrant.<sup>2</sup> The other bedroom located at the back of the apartment appeared to belong to Conti.

<sup>2</sup> Conti has shared custody of a minor child. The minor child was not with Conti at the time of this warrant.

1           16. During the execution of the search warrant, Conti made unsolicited  
2 statements that he was a drug addict and that he was in possession of fentanyl. Agents  
3 found several baggies containing blue pills in the bedroom of Conti, which based on their  
4 training and experience, along with Conti's utterances, is consistent with counterfeit, blue  
5 pills, marked M/30 containing fentanyl. Agents recovered several thousand pills,  
6 although a complete count is pending. Also recovered were baggies containing powdery  
7 substances that are pending identification.

8           17. Based on my training and experience, I believe the quantity of suspected  
9 fentanyl pills found in Conti's bedroom is in excess of a typical personal use amount and  
10 is consistent with distribution amounts.

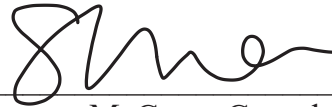
11           18. Agents also recovered a firearm from a safe located underneath Conti's bed  
12 in his bedroom. The firearm was loaded.

13           19. Conti was provided his *Miranda* warnings and agreed to speak to agents.  
14 Conti admitted he had recently purchased approximately 5,000 fentanyl pills from  
15 Mandel Jackson. Conti also admitted he sold fentanyl to help support his drug habit  
16 financially. Conti admitted he was concerned about the quality of the fentanyl pills, so he  
17 also purchased fentanyl powder.

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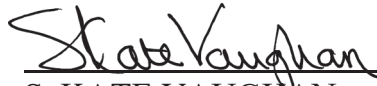
1           20. Based on the above facts, I respectfully submit there is probable cause to  
2 believe Chad Conti did knowingly and intentionally possess with intent to distribute a  
3 controlled substance, N-phenyl-N-[ 1- (2-phenylethyl) -4-piperidinyl] propanamide  
4 (fentanyl), in violation of Title 21, United States Code, Section 841(a)(1).  
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8 Shawna McCann, Complainant  
9 Special Agent, FBI  
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11           Based on the Complaint and Affidavit sworn to me via telephone, the Court  
12 hereby finds that there is probable cause to believe the Defendant(s) committed the  
13 offense set forth in the Complaint.

14           Dated this 2nd day of October, 2024.  
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18 S. KATE VAUGHAN  
19 United States Magistrate Judge  
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